

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
KNEPPER & CLARK LLC
10040 W. Cheyenne Ave., Suite 170-109
Las Vegas, NV 89129
Phone: (702) 825-6060
Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRENDA WILSON,

Plaintiffs,

vs.

CHASE MORTGAGE; FMC-OMAHA;
EXPERIAN INFORMATION SOLUTIONS,
INC.; EQUIFAX INFORMATION SERVICES
LLC; and TRANS UNION, LLC,

Defendants.

Case No.: 2:19-cv-00055-RFB-NJK

**JOINT MOTION TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO MOTION
TO DISMISS**

[FIRST REQUEST]

Plaintiff Brenda Wilson ("Plaintiff") and Defendant Trans Union LLC ("Trans Union")
(collectively, the "Parties") by and through their counsel of record hereby move jointly to extend

Plaintiff's deadline to respond to Trans Union's Motion to Dismiss (21) twenty-one days:
JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS [FIRST
REQUEST] - 1

1 1. On January 9, 2019, Plaintiff filed a Complaint [ECF Dkt. 1].

2 2. On February 21, 2019, Trans Union filed a Motion to Dismiss the Complaint [ECF
3 Dkt.18].

4 3. Plaintiff's Response is due March 7, 2019.

5 4. Plaintiff and Trans Union have agreed to extend Plaintiff's response twenty-one
6 days in order to allow Plaintiff's counsel to continue their efforts to reach a mutually agreeable
7 resolution to this matter. As a result, both Plaintiff and Trans Union hereby request this Court to
8 further extend the date for Plaintiff to respond to Trans Union's Motion to Dismiss Complaint until
9 **March 28, 2019.** This joint motion is made in good faith, is not interposed for delay, and is not
10

11 //

12 //

13 //

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS [FIRST
26 REQUEST] - 2
27
28

1 filed for an improper purpose.

2 Dated February 28, 2019.

3
4 **KNEPPER & CLARK LLC**

5 /s/ Miles N. Clark

6 Matthew I. Knepper, Esq.
7 Nevada Bar No. 12796
8 Miles N. Clark, Esq.
9 Nevada Bar No. 13848
10 Shaina R. Plaksin, Esq.
11 Nevada Bar No. 13935
12 10040 W. Cheyenne Ave., Suite 170-109
13 Las Vegas, NV 89129
14 Email: matthew.knepper@knepperclark.com
15 Email: miles.clark@knepperclark.com

16 **HAINES & KRIEGER LLC**

17 David H. Krieger, Esq.
18 Nevada Bar No. 9086
19 8985 S. Eastern Avenue, Suite 350
20 Henderson, NV 89123
21 Email: dkrieger@hainesandkrieger.com

22 *Counsel for Plaintiff*

23 **ALVERSON TAYLOR & SANDERS**

24 /s/ Trevor Waite

25 Kurt R. Bonds, Esq.
26 Nevada Bar No. 6228
27 Trevor Waite, Esq.
28 Nevada Bar No. 13779
6605 Grand Montecito Parkway, Suite 200
Las Vegas, NV 89149
Email: kbonds@alversontaylor.com
Email: twaite@alversontaylor.com

*Counsel for Defendant
Trans Union LLC*

17 *Wilson v. Equifax Information Services, LLC et al*
18 *2:19-cv-00055-RFB-NJK*

19 **ORDER GRANTING**

20 **JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO**

21 **TRANS UNION's MOTION TO DISMISS**

22
23
24 **IT IS SO ORDERED.**

25 
26 RICHARD F. BOULWARE, II
27 UNITED STATES DISTRICT JUDGE

28 DATED this 11th day of March, 2019.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2019, and pursuant to the Federal Rules of Civil Procedure, a true and correct copy of the foregoing **JOINT MOTION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS** was served via the U.S. District Court's electronic filing system to all individuals entitled to receive service thereon.

/s/ Lucille Chiusano
An employee of KNEPPER & CLARK LLC